

1 IN THE UNITED STATES DISTRICT COURT FOR THE  
 2 NORTHERN DISTRICT OF OKLAHOMA  
 3  
 4

5 W. A. DREW EDMONDSON, in his )  
 6 capacity as ATTORNEY GENERAL )  
 7 OF THE STATE OF OKLAHOMA and )  
 8 OKLAHOMA SECRETARY OF THE )  
 9 ENVIRONMENT C. MILES TOLBERT,) )  
 10 in his capacity as the )  
 11 TRUSTEE FOR NATURAL RESOURCES) )  
 12 FOR THE STATE OF OKLAHOMA, )

13 Plaintiff, )

14 vs. )

4:05-CV-00329-TCK-SAJ

15 TYSON FOODS, INC., et al, )

16 Defendants. )

17 -----  
 18 VOLUME II OF THE VIDEOTAPED  
 19 30(b)(6) DEPOSITION OF TIMOTHY MAUPIN,  
 20 produced as a witness on behalf of the Plaintiff in  
 21 the above styled and numbered cause, taken on the  
 22 22nd day of July, 2008, in the City of Tulsa, County  
 23 of Tulsa, State of Oklahoma, before me, Lisa A.  
 24 Steinmeyer, a Certified Shorthand Reporter, duly  
 25 certified under and by virtue of the laws of the  
 State of Oklahoma.

**TULSA FREELANCE REPORTERS**  
**918-587-2878**

**EXHIBIT**

19

1 Value Added Meats.

2 Q All right, and when did that name change  
3 occur?

4 A June 1st, 2008.

5 Q And why did that occur, if you know? 10:27AM

6 A The food service area of Cargill Value Added  
7 Meats separated to become its own business unit.

8 Q What kind of legal entity is Cargill Value  
9 Added Meats Retail?

10 A It's only a profit and loss center within the 10:27AM  
11 platform. It's not a legal entity.

12 Q All right. So let's try and get things  
13 organized for me. We start at the top with Cargill,  
14 Inc., and we start at the bottom and we have Cargill  
15 Turkey Production, LLC. I want you to fill in the 10:28AM  
16 blanks in between with regard to the corporate  
17 structure from the LLC to the parent Cargill, Inc.  
18 Is the next structure above Cargill Turkey  
19 Production, LLC, CVAM Retail, Cargill Value Added  
20 Meats retail? 10:28AM

21 MS. HILL: Object to the form.

22 A From an organizational structure standpoint,  
23 that's correct. From a legal entity standpoint,  
24 it's not correct.

25 Q Okay. The legal entity structure then -- what 10:29AM

1 would be the legal entity above Cargill Turkey  
2 Production, LLC?

3 A Cargill Meat Solutions, Incorporated.

4 Q And does Cargill Meat Solutions, Incorporated  
5 own 100 percent of Cargill Turkey Production, LLC? 10:29AM

6 A Yes, to my knowledge it does.

7 Q Does Cargill, Inc., own 100 percent of Cargill  
8 Meat Solutions, Inc.?

9 A Yes, to my knowledge they do.

10 Q Is there any legal entity between Cargill Meat 10:29AM  
11 Solutions, Inc., and Cargill, Inc., in the  
12 structure?

13 A Not to my knowledge.

14 Q All right. Are there any other organizational  
15 structures between Cargill Meat Solutions and 10:30AM  
16 Cargill, Inc.?

17 MS. HILL: Object to the form.

18 A The platform as it now exists is Cargill  
19 Animal Protein. It's not a legal entity but it's a  
20 platform within the business. 10:30AM

21 Q So if I were -- I may be describing this  
22 differently than you perceive and if so, you need to  
23 correct me so I understand it. If I were to look in  
24 the organizational structure, not the legal  
25 structure starting at the bottom with Cargill Turkey 10:30AM